

# **EXHIBIT "B"**

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[1] Q. Was it a joint ownership or was the house  
[2] owned -- was it a joint ownership?  
[3] A. Yes.  
[4] Q. For how long did you own that home?  
[5] A. About thirty years.  
[6] Q. That takes me to 1999. Is that right?  
[7] A. Somewhere around there.  
[8] Q. Did you then sell the house?  
[9] A. No.  
[10] Q. What happened to your ownership in the  
[11] house after approximately thirty years?  
[12] A. We put it into a trust.  
[13] Q. Okay. What trust?  
[14] A. I believe they call it a granters reserve  
[15] trust.  
[16] Q. When did you do that?  
[17] A. I would have to find that out for you.  
[18] Q. How would you go about doing that?  
[19] A. Go find the trust.  
[20] MR. HART: As we get through some of  
[21] this, there could be a lot of  
[22] intertwining of, like the trust and who  
[23] it would go to and things along those  
[24] lines. We would ask, if you don't mind,

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[1] can we agree to confidentiality for this  
[2] transcript? At this point you just have  
[3] facts, which are of no consequence.  
[4] MR. CASEY: Yes, we can talk about  
[5] that maybe during a break. But I don't  
[6] think there is going to be any problem  
[7] with that. Can we just find out who,  
[8] rather than having me ask a lot of  
[9] questions about it, can you tell me who  
[10] owned the house on the date of the  
[11] drowning?  
[12] THE WITNESS: It was in trust.  
[13] BY MR. CASEY:  
[14] Q. Who was the trustee?  
[15] MR. HART: That you can answer.  
[16] BY MR. CASEY:  
[17] Q. Who was the trustee?  
[18] A. Barbara Longwill.  
[19] Q. Who is Barbara Longwill?  
[20] A. My wife.  
[21] Q. Do you have trust documents reflecting  
[22] this conveyance from your ownership with your  
[23] wife to the trust?  
[24] A. Yes.

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[1] MR. CASEY: Dan, do we have that  
[2] document?  
[3] MR. HART: No.  
[4] MR. CASEY: Can I have them?  
[5] MR. HART: If you make a request.  
[6] MR. CASEY: I am making that request  
[7] now.  
[8] MR. HART: I don't know if we have  
[9] them here.  
[10] BY MR. CASEY:  
[11] Q. You told me that you owned the house for  
[12] approximately thirty years. Can you tell me,  
[13] with any more specificity, when that conveyance  
[14] was made?  
[15] A. I assume you will find that out when we  
[16] get that document, and it will give a date of  
[17] transfer.  
[18] Q. Can you give me, sir, your own  
[19] understanding as to the date of --  
[20] A. I don't know.  
[21] Q. You can't give me any more specific date  
[22] other than approximately 1999?  
[23] A. Somewheres around there, yes.  
[24] Q. But from what you're telling me, I

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[1] understand that on the date of your  
[2] granddaughter's death, you're confident that  
[3] the trust owned your Coachman Road house?  
[4] A. Correct.  
[5] Q. For what reason did you make that  
[6] conveyance from your individual ownership to  
[7] the trust in the name of your wife?  
[8] MR. HART: I'm going to have to  
[9] object because the scope of the  
[10] deposition here is venue and  
[11] jurisdiction, as far as his individual  
[12] contacts with the Commonwealth of  
[13] Pennsylvania. His motivation for  
[14] forming the trust, I don't think, has  
[15] anything to do with the issues here.  
[16] BY MR. CASEY:  
[17] Q. Were there any other entities, other than  
[18] your wife, named as trustee?  
[19] A. No.  
[20] Q. Do you own any businesses today, sir?  
[21] A. Personally?  
[22] Q. Yes.  
[23] A. No.  
[24] Q. Do you, through any corporate or other